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with spill response procedures. In the final evaluation phase, facilities should require a regular assessment of the prevention plan's effectiveness, including an annual inspection of site equipment, material handling and storage areas, and other parts of the site covered by the plan. This phase relies on good recordkeeping and reporting procedures for spills, leaks, and other discharges, EPA notes.

In addition to describing the basic phases for developing prevention plans, EPA's draft guidance sets out specific BMPs for activities that may contaminate stormwater. For instance, for fueling operations, EPA says facilities should consider installing spill and overflow protection, discourage topping off of fuel tanks, checking for leaking underground storage tanks, and other practices. The guide offers similar information for maintaining, painting, and washing vehicles and equipment, loading and unloading materials, and other activities.

6-23-92
Steve Re. NE
It reminds me of the
resposal that
is supposed
to have been
sent to Reg.
5 about
recycling
the NE
waste
pile. Is
anything
going to
happen
with that
proposal?
Helen
Keeplinger
12

Paving way for other sites

EPA RECOMMENDS INNOVATIVE SUPERFUND CLEANUP BASED ON RECYCLING WASTE

A new Superfund cleanup plan developed by an EPA regional office is apparently the first to make recycling the primary remedy, opening the door for expanded use of such "productive" waste removal techniques in place of the traditional incineration, industry and EPA sources say. While several sources say the Pennsylvania site for which the plan was developed has certain unique features which make recycling particularly appropriate, these sources also say the cleanup plan is a first step for Superfund to explore cleanups that may produce marketable products instead of simply generating waste.

The cleanup plan was developed by EPA's Region III office for the Eastern Diversified Metals Superfund site in Eastern Pennsylvania. The site was once a metals reclamation plant, where plastic and fiber insulation was stripped from electrical wires so the metal inside could be reused. About 150 million pounds of this "fluff" were dumped in a single pile 40-60 feet high and covering nearly 8 acres. EPA has determined that the pile poses an unacceptable health risk due to possible human exposure to heavy metals in the fluff.

According to a proposed remedial action plan for the pile, EPA believes the best approach is to recycle the plastic fluff into pellets or a plastic mass which can be reused in plastic lumber, car bumpers, cushions and fillers. The agency suggests the pile could be reduced by 40-60% of its current volume, with the remaining wastes being treated and landfilled. In addition, EPA and industry sources say the recycled plastic would be sold to recoup costs of the cleanup, a prospect most sources say is completely new to Superfund.

Industry sources say the proposed plan represents a tremendous step for EPA towards more innovative and cost-effective cleanups. Industrial potentially responsible parties "would sure like to see this thing catch on," says one industry source, because it is more cost-effective and "the right thing for the environment." Another industry source applauds EPA for avoiding Superfund's traditional choices of incinerating the waste material or capping it on-site, saying that the recycling alternative removes the material and creates an economic benefit from the cleanup as well.

EPA sources say the recycling approach may be applicable to other sites as well, though these sources acknowledge that it is not a reasonable solution for many sites. An industry source notes that many Superfund sites are complex mixtures of hazardous liquids and contaminated soils with a large number of PRPs, making recycling virtually impossible. But at sites with a large volume of a single waste, recycling or reclamation may be a strong possibility, this source says. An EPA source says recycling "should be able to be used at other sites," depending on the site-specific characteristics, though this source notes that a key feature of any recycling plan must be finding a market for the recycled product. At the Pennsylvania site, if no market is found for the plastic within a certain time, probably two years, the site will be capped instead, agency sources say. EPA is also reportedly attempting to incorporate recycling into a Superfund cleanup in Washington dealing with lead and plastic casings from old automotive batteries.

EPA LOSES AGENCY BUDGET CHAMPION WITH HOUSE SUBCOMMITTEE CHAIR'S RETIREMENT

The retirement of the chairman of the House Appropriation Subcommittee overseeing EPA's budget is being viewed by EPA sources as a serious blow to the agency's effort to gain congressional support for key initiatives.

House Appropriations VA, HUD & independent agencies subcommittee Chair Robert Traxler (D-MI), on April 30 announced he will not seek reelection in the fall. Traxler last year engineered an effort to cut \$1.9 billion from the National Aeronautics & Space Administration's space station project, shifting \$300

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